



DIAMOND McCARTHY LLP

TWO HOUSTON CENTER
909 FANNIN, STE. 1500
HOUSTON, TEXAS 77010

CHRISTOPHER R. MURRAY | ASSOCIATE
cmurray@diamondmccarthy.com

P. 713.333.5100
F. 713.333.5195

March 17, 2014

Via Electronic Mail and ECF Filing

Hon. Martin Glenn
United States Bankruptcy Judge
Southern District of New York
One Bowling Green
New York, NY 10004

**Re: *In re: Dewey & LeBoeuf LLP*, Case No. 12-12321 (MG);
Proposed Scheduling Order for Partner Clawback Litigation**

Dear Judge Glenn,

We represent Alan M. Jacobs, the Liquidating Trustee ("Liquidating Trustee") of the Dewey & LeBoeuf Liquidation Trust, in the above-referenced case with respect to clawback litigation against former partners and equity holders of Dewey & LeBoeuf LLP ("Debtor").

The Liquidating Trustee filed adversary proceedings against several former partners of the Debtor to recover alleged transfers. Each of the pending cases is set for an initial case management conference on **March 20, 2014 at 10:00 am**.

The Liquidating Trustee files as **Exhibit A** his proposed case management and scheduling order that would apply to all partner clawback adversary cases. This proposed order is the product of good faith negotiations with a group of several defendants, most of whom are represented by counsel, over the past few weeks. Once agreement was finally reached with the group on Friday, the Liquidating Trustee circulated the agreed order to the other defendants who did not participate in the group negotiations. As of the filing of this letter, the Liquidating Trustee is still receiving comments from those defendants.

The table below summarizes the status of the clawback adversaries and the position of each defendant with respect to the proposed order.

Defendant	Adv. No.	Case Status	Position on Proposed Order
Altorelli, John	14-01015	Served	Agreed
Auchter, Robert	14-01013	Settled	
Blanchard, Eric	13-01777	Served	Agreed
Christian, Glynnna	13-01773	Served	Agreed
Coll, Geoffrey	13-01776	Stayed/BK	
Cowan, Eric	14-01796	Served	Agreed

Defendant	Adv. No.	Case Status	Position on Proposed Order
Greene, David	14-01797	Served	No objection received
Jansen, Chiu-Ti	14-01816	Settled	
Keiserman, John	13-01774	Settled	
LaRose, Lawrence	13-01768	Served	No objection received
Mahoney, Terrence	14-01817	Served	No objection received
Marcoux, William	13-01687	Answer filed	Agreed
McMillan, L. L.	13-01772	Served	Agreed
Nissan, Ilan	14-01820	Answer filed	No objection received
Nugent, Christian	14-01821	Answer filed	No objection received
Otillar, Steven	14-01818	Served	Agreed
Owens, Gregory	13-01796	Stayed/BK	
Radke, Mark	13-01770	Served	In discussions
Reinke, Fred	13-01775	Served	Agreed
Shaw, Anthony	13-01771	Served	Agreed
Steele, Michael	14-01795	Served	No objection received
Thomas, Dirk	14-01014	Settled	
Zdrojeski, Ronald	14-01794	Served	No objection received

The Liquidating Trustee anticipates supplementing this letter and report as appropriate prior to the hearing.

Respectfully submitted,

/s/ Christopher R. Murray

Christopher R. Murray, Esq. (*pro hac vice*)
Counsel to the Liquidating Trustee

cc. Alan M. Jacobs
ECF Notice Recipients